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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

14 CHRISTOPHER HAMILTON, an
individual,

15 Plaintiff,

16 v.

17 JAMES RIVER INSURANCE
18 COMPANY, an Illinois corporation;
DOES I through X, and ROE
19 CORPORATIONS I through X, inclusive,

20 Defendants.

) Case No. 2:18-cv-00142-APG-VCF

) **STIPULATION AND ORDER TO**
) **EXTEND DISCOVERY**
) **(FIRST REQUEST)**

21
22 All of the parties hereto, and for good cause described in this stipulation, and in
23 accord with Local Rule 6-1 and Local Rule 26-4, the parties hereby request this
24 Honorable Court to adopt and approve this stipulated extension to the discovery plan,
25 and continue the discovery deadlines for 90 days as requested herein.

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1 **I. LOCAL RULE 6-1 IS SATISFIED**

2 This is the first request for extension of discovery deadlines filed by the parties.
3 Pursuant to the Stipulated Discovery Plan and Order dated March 9, 2018, the
4 following dates govern for purposes of discovery:

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|----|--|-------------------|
| 5 | 1. Discovery Cutoff Date: | August 8, 2018 |
| 6 | 2. Motions to amend pleadings and add parties: | May 10, 2018 |
| 7 | 3. Expert Designations: | June 9, 2018 |
| 8 | 4. Rebuttal Expert Designations: | July 9, 2018 |
| 9 | 5. Dispositive Motions: | September 7, 2018 |
| 10 | 6. Joint Pre-Trial Order: | October 8, 2018 |

11 The parties have been working in good faith to reach an amicable resolution.
12 However, Plaintiff is still undergoing medical treatment and as such, is in the process
13 of compiling complete information for initial disclosures and supplying requested
14 HIPPA authorizations. As such, the parties need additional time to prepare for the
15 disclosure of initial experts. Accordingly, the parties are requesting a 90-day extension
16 to all discovery deadlines.

17 The instant request comports with Local Rule 6-1, in that no request is being
18 made after the expiration of the specified period.

19 **II. LOCAL RULE 26-4 IS SATISFIED**

20 The instant request to extend discovery deadlines satisfies the requisites of Local
21 Rule 26-4. While the deadline for motions to amend pleadings and add parties is less
22 than 21 days away, all other deadlines are more than twenty-one (21) days from the
23 filing of the instant stipulation and order.

24 Additionally, good cause exists for the extension. While the parties would like
25 to reach a settlement, Plaintiff is still undergoing medical treatment and the parties
26 require additional time to conduct discovery in preparation for initial expert
27 disclosures. Defendant is still awaiting Plaintiff's initial disclosures and HIPPA
28 authorizations, and additional time is required to issue subpoenas, schedule

1 depositions and to complete discovery. As a result, the parties have requested all
2 discovery deadlines be extended 90 days.

3 Listed below is a statement specifying the discovery completed in this case:

4 Defendant, James River Insurance Company's April 4, 2018
5 First Requests for Admissions to Plaintiff
Christopher Hamilton

6 Defendant, James River Insurance Company's April 4, 2018
7 First Set of Interrogatories to Plaintiff
Christopher Hamilton

8 Defendant, James River Insurance Company's April 4, 2018
9 First Requests for Production of Documents to
Plaintiff Christopher Hamilton

10 Defendant, James River Insurance Company's April 16, 2018
11 Initial Disclosures made Pursuant to LR 26-1
and FRCP 26(a)(1)

12 The parties are attempting to work towards settlement. However, as Plaintiff is
13 still undergoing medical treatment, it is necessary to extend the discovery deadlines so
14 the parties can procure additional records, obtain experts, and schedule depositions.

15 Finally, under Local Rule 26(4), it is necessary to articulate a proposed schedule
16 for completing all remaining discovery. The parties are requesting an additional 90
17 days be afforded for discovery.

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1 The following deadlines are requested.

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|---|--|-------------------|
| 2 | 1. Discovery Cutoff Date: | November 6, 2018 |
| 3 | 2. Motions to amend pleadings and add parties: | August 8, 2018 |
| 4 | 3. Expert Designations: | September 7, 2018 |
| 5 | 4. Rebuttal Expert Designations: | October 7, 2018 |
| 6 | 5. Dispositive Motions: | December 6, 2018 |
| 7 | 6. Joint Pre-Trial Order: | January 6, 2019 |

8 The parties hereby stipulate to the proposed changes in the discovery deadlines.

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10 Dated this 1st day of May, 2018

11 BREMER, WHYTE, BROWN
12 & O'MEARA, LLP

13 

14 Lucian J. Greco, Jr, Esq.
15 Nevada State Bar No. 10600
16 Jared G. Christensen, Esq.
17 Nevada State Bar No. 11538
18 Deleela M. Weinerman
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20 Attorneys for Defendant,
21 James River Insurance Company
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Dated this 1st day of May, 2018

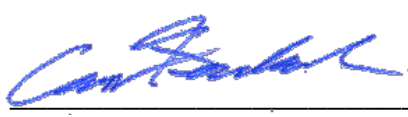
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ORDER
IT IS SO ORDERED:




UNITED STATES MAGISTRATE JUDGE

Dated: 5-1-2018

The **STIPULATION AND ORDER TO EXTEND DISCOVERY (FIRST REQUEST)** in 2:18-cv-00142-APG-VCF was submitted by:

BREMER WHYTE BROWN & O'MEARA LLP

By: 
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